

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

INGENIADOR, INC.
Plaintiff,

v.

ALFRESCO SOFTWARE, INC.;
AUTONOMY CORPORATION;
BLACKBOARD, INC.; BRIDGELINE
DIGITAL; EMC CORPORATION;
HEWLETT-PACKARD COMPANY;
INFORMATICA CORPORATION;
LASERFICHE; LEXMARK
INTERNATIONAL, INC.; MICROSOFT
CORPORATION; NUXEO; OBJECTIVE
CORPORATION LIMITED; OPENTEXT
CORPORATION; ORACLE
CORPORATION; SAP AG; SDL; AND
SPRINGCM.

Defendants

CIVIL NUM.: 11-1840 (GAG)

REQUEST FOR TRIAL BY JURY

PATENT INFRINGEMENT

LEAVE FOR EXTENSION OF TIME TO OPPOSE MOTIONS TO DISMISS

COMES NOW, Plaintiff, Ingeniador, Inc. ("Ingeniador"), through the undersigned attorney and very respectfully, states and prays as follows:

1. Defendants in the case at bar have filed and continue to file Motions to Dismiss. To this date, at least thirteen (13) motions to dismiss have been filed. One of these motions was filed as recently as November 14, 2011

2. This Honorable Court granted Plaintiffs until December 1st, 2011 to respond to all ten (10) motions to dismiss. (Docket No. 123 and 134). On November 15, 2011 this Honorable Court

applied the same deadline to oppositions to all the motions to dismiss, including those that have been filed in the last five days. Therefore, all oppositions are due on December 1, 2011. (Docket No. 140)

3. Ingeniador has already been working and continues to work diligently and extensively in its oppositions. Notwithstanding the on-going efforts, Ingeniador needs additional time to fully and adequately complete its work. Due to the number of motions being filed in consecutive dates; the varied nature of the arguments being raised, covering issues concerning jurisdiction, venue, joinder and sufficiency of the allegations; and, being that each defendant has a particular set of facts that applies to the different legal issues, it is respectfully submitted that the time available for Ingeniador to file oppositions is not sufficient. Accordingly, Ingeniador requests from this Honorable Court an additional 15-day extension of time to oppose the Motions to Dismiss that have been filed.

4. The 15-day extension would be until December 16, 2011. This extension should not delay the proceedings nor cause any prejudice on any of the parties since the case is in its initial stage.

WHEREFORE, it is respectfully requested that this Honorable Court grant Plaintiff's leave for an additional fifteen (15) day period, until December 16, 2011, to oppose Motions to Dismiss.

I HEREBY CERTIFY: that on this same date, copy of this motion was filed with the Clerk of the Court, using the CM/ECF System which will send notification of such filling to the attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 17th day of November, 2011.

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